

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MAVERICK GAMING, LLC,

Plaintiff,

v.

UNITED STATES OF AMERICA,
UNITED STATES DEPARTMENT OF
THE INTERIOR, DEB HAALAND,
BRYAN NEWLAND, JAY INSLEE,
ROBERT FERGUSON, BUD
SIZEMORE, JULIA PATTERSON,
ALICIA LEVY, KRISTINE REEVES,
SARAH LAWSON, STEVE CONWAY,
JEFF HOLY, SHELLEY KLOBA,
BRANDON VICK, and TINA GRIFFIN,

Defendants.

Civil Action NO. 1:22-cv-00068-FYP

MOTION FOR LIMITED ADMISSION PURSUANT TO LCvR 83.2(d)

(PRO HAC VICE)

Identity of Moving Party:

Name: Kristin Beneski Bar No.: WSBA No. 45478

District of Columbia Bar Membership: Government

Address: 800 Fifth Avenue, Suite 2000, Seattle, WA 98104

Telephone No. (206) 464 – 7744 Email: Kristin.Beneski@atg.wa.gov

Identity of Applicant for Limited Admission:

Name: Tera Heintz Bar No.: WSBA No. 54921

Jurisdiction of Primary Practice: State of Washington

Address: 1125 Washington Street S.E., Olympia, WA 98504-0100

Telephone No. (360) 753-6200

Email: tera.heintz@atg.wa.gov

Statement of Relief Sought:

Limited admission of the above-named applicant to the practice of law pursuant to LCvR 83.2(d) for the purpose of appearing as a lawyer in this proceeding.

Facts Relevant to Motion:

Plaintiff Maverick Gaming LLC has named the following parties as defendants (State Defendants) in this matter:

- JAY INSLEE, in his official capacity as the Governor of Washington;
- ROBERT W. FERGUSON, in his official capacity as the Attorney General of Washington;
- BUD SIZEMORE, in his official capacity as Chair of the Washington State Gambling Commission;
- JULIA PATTERSON, in her official capacity as Vice-Chair of the Washington State Gambling Commission;
- ALICIA LEVY, in her official capacity as Commissioner of the Washington State Gambling Commission;
- KRISTINE REEVES, in her official capacity as Commissioner of the Washington State Gambling Commission;
- SARAH LAWSON, in her official capacity as Commissioner of the Washington State Gambling Commission;
- STEVE CONWAY, in his official capacity as ex officio member of the Washington State Gambling Commission;

- JEFF HOLY, in his official capacity as ex officio member of the Washington State Gambling Commission;
- SHELLEY KLOBA, in her official capacity as ex officio member of the Washington State Gambling Commission;
- BRANDON VICK, in his official capacity as ex officio member of the Washington State Gambling Commission; and
- TINA GRIFFIN, in her official capacity as Interim Director of the Washington State Gambling Commission.

Applicant Tera Heintz represents State Defendants and wishes to appear as co-counsel in this matter. Ms. Heintz has been admitted to practice in California since 2005 and is presently a member in good standing in the Washington State Bar Association. She is not an active member of the District of Columbia Bar, and does not have a pending application.

Grounds for Relief and Argument:

This Motion is made pursuant to LCvR 83.2(d) and is based on the accompanying certifications of the Moving Party and the Applicant for Limited Admission.

DATED this 18th day of February 2022.

ROBERT W. FERGUSON
Attorney General of Washington

s/ Kristin Beneski
KRISTIN BENESKI, WSBA No. 45478
First Assistant Attorney General
800 Fifth Avenue, Suite 2000
Seattle, WA 98104-3188
(206) 464-7744
kristin.beneski@atg.wa.gov

CERTIFICATION OF APPLICANT FOR LIMITED ADMISSION

I hereby certify under penalty of perjury under the laws of the District of Columbia that:

1. I am a member in good standing of the bar of the State of Washington as my jurisdiction of primary practice.
2. I have read the Rules of Professional Conduct adopted by the District Court for the District of Columbia and will abide by them.
3. I have complied with all of the requirements of LCvR 83.2(d).
4. I have read the foregoing motion and the statements contained in it are full, true and correct.

Signed on February 18, 2022 at Olympia, Washington.

s/ Tera Heintz

TERA HEINTZ

Applicant for Limited Admission

CERTIFICATION OF MOVING PARTY

I hereby certify under penalty of perjury under the laws of the District of Columbia that:

1. I am a member in good standing of the bar of the State of Washington as my jurisdiction of primary practice, and am admitted to practice in the USDC for the District of Columbia as an attorney employed by a State, pursuant to LCvR 83.2(f).
2. I will be the attorney of record in this proceeding, responsible for the conduct of the applicant, and present at proceedings in this matter unless excused by the court.
3. I have electronically submitted for payment the \$100 fee for admission.
4. I have read the foregoing motion and the statements contained in it are full, true and correct.

Signed on February 18, 2022 at Seattle, Washington.

s/ Kristin Beneski
KRISTEN BENESKI
Moving Party

ORDER

It is hereby ORDERED the Applicant for Limited Admission pursuant to LCvR 83.2(d) listed above is admitted to practice as an attorney in this proceeding. The Moving Party shall be the lawyer of record herein, is responsible for the conduct hereof, and shall be present at all proceedings unless excused by this Court.

DATED _____

Judge/Commissioner/Clerk

Presented by:

ROBERT W. FERGUSON
Attorney General of Washington

s/ Kristin Beneski
KRISTIN BENESKI, WSBA No. 45478
First Assistant Attorney General
800 Fifth Avenue, Suite 2000
Seattle, WA 98104-3188
(206) 464-7744
kristin.beneski@atg.wa.gov

CERTIFICATE OF SERVICE

I certify, under penalty of perjury under the law of the District of Columbia, that the foregoing was electronically filed in the United States District Court for the District of Columbia and electronically served on the following parties:

Theodore B. Olson, DCBA No.
Matthew D. McGill, DCBA 481430
Lochlan F. Shelfer, DCBA No. 1029799
Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036
(202) 955 – 8668
tolson@gibsondunn.com

Daron T. Carreiro
United States Department of Justice
Environment and Natural Resources Division
P.O. Box 7611
Ben Franklin Station
Washington, D.C. 20044-7611
(202) 305-1117
daron.carreiro@usdoj.gov

DATED this 18th day of February 2022,

ROBERT W. FERGUSON
Attorney General of Washington

s/ Kristin Beneski
KRISTIN BENESKI, WSBA No. 45478
First Assistant Attorney General